



STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY
DEPARTMENT OF SOCIAL SERVICES
744 P Street • Sacramento, CA 95814 • www.cdss.ca.gov



EDMUND G. BROWN JR.
GOVERNOR

April 7, 2017

Mr. Mike Miller, Director
San Joaquin County Human Services Agency
102 San Joaquin Street
P. O. Box 201056
Stockton, CA 95201-3006

Dear Mr. Miller:

This letter is to advise you that the Corrective Action Plan San Joaquin County submitted on April 6, 2017, in response to the results of our 2015 Civil Rights Compliance Review is approved.

We will be monitoring the implementation of your corrective action items through your Civil Rights Coordinator.

If you have any questions, please contact Daniel Cervantes at (916) 654-2107. You may also contact your consultant by e-mail at Daniel.Cervantes@dss.ca.gov.

Sincerely,

Original signed by Tiffany Marsh

TIFFANY MARSH, Acting Chief
Civil Rights Unit
Welfare to Work Division

c: Melissa Sangalang, Civil Rights Coordinator

Kim McCoy Wade, Chief
CalFresh Policy Bureau

Carlos Ocampo, Chief
Field Operations Bureau

Tami Gutierrez, Chief
CalFresh Management Operations Section

Paul Gardes
CalFresh Policy Bureau

Jacqueline Hom
State Refugee Coordinator

Joe Torres, Office of Civil Rights
USDA Food and Nutrition Services
Supplemental Nutrition Assistance Program (SNAP)
Western Region

Andrew Riesenbergl
USDA Food and Nutrition Services
Supplemental Nutrition Assistance Program (SNAP)
Western Region

Kevin Aslanian
Coalition of California Welfare Rights Organizations, Inc.

Antoinette Dozier
Western Center on Law and Poverty

CIVIL RIGHTS COMPLIANCE REVIEW

May 2015



CORRECTIVE ACTION PLAN

Upon reviewing the cited deficiencies and the items requiring corrective action, we have determined that a significant number are fully covered by HSA handbooks and/or other guidance. This has led to the conclusion that refresher training, covering some of the fundamentals of the Civil Rights requirements, is needed.

Listed below are the items identified in the Civil Rights Compliance Review Report as requiring corrective action.

III. DISSEMINATION OF INFORMATION

Posters: San Joaquin HSA shall ensure that the most recent version of posters on nondiscrimination provided by CDSS and USDA are prominently displayed in all waiting areas and reception rooms.

Corrective Action: Pub 13 has been provided in alternate formats to the Reception area for use by clients as necessary. Large print Pub 13's are available to all employees through the internet and printed copies have specifically been provided to Adult Services Workers. The HSA Civil Rights Coordinator maintains Braille copies of Pub 13, as well as a cd version (English and Spanish). Workers can contact the Coordinator when these are needed. They are also available in the Reception and Applications Unit (RAU). All posters have been reviewed and miscellaneous forms and paperwork has been moved so as not to cover the required posters.

All HSA workers have access to the internet and, therefore, to large print or otherwise modified material available through CDSS. The alternate format publications are also available in Personnel.

IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES

Location: 900 East Oak Street, 2nd Floor, Stockton, CA CalWORKs Employment Services Center

Restrooms-2nd Floor: The door pressure in the *Men's* restroom is excessive at 9 lbs. In the *Women's* restroom, door pressure is excessive at 9 lbs.

Corrective Action: The facilities management company responsible for building maintenance, Cort, has made these corrections.

Restrooms-3rd Floor: The door pressure in the Men's restroom is excessive at 10 lbs. The door pressure in the Women's restroom is excessive at 9 lbs.

Corrective Action: The facilities management company responsible for building maintenance, Cort, has made these corrections.

<p style="text-align: center;">Human Services Agency Location: 102 S. San Joaquin St. Stockton, CA</p>
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Restrooms (Men & Women's): Door pressure excessive at 8 lbs. in the men's restroom and 9 lbs. in the women's rest room.

Corrective Action: Door pressure has been re-adjusted to 5 lbs.

V. PROVISION FOR SERVICES TO APPLICANTS AND RECIPIENTS WHO ARE NON-ENGLISH SPEAKING OR WHO HAVE DISABILITIES

Written Materials: San Joaquin County will continue to use and provide translated forms, to include translated notice of action forms, in the clients' primary language when translated by CDSS.

Corrective Action: HSA will provide ongoing education and training to workers. For a primary language form, HSA has developed and utilizes form SJ 100, Documentation of Language Preference for Written Communications and Offer of Interpreter.

VI. DOCUMENTATION OF APPLICAN/RECIPIENT CASE RECORDS

Documentation if client provided own interpreter: When applicants /recipients provide their own interpreter, the CWD shall ensure that the applicants/recipients are informed of the potential problems for ineffective communication. The CWD shall document in the case record that the applicant/recipient was so informed.

Corrective Action: Staff is trained upon hire and annually thereafter how to correctly document any occasion where applicants/recipients provide their own interpreter. Ongoing education and training continues to be provided for workers.

The recent inclusion of a Universal Template in C-IV allows workers to document in the case record that the client has provided their own interpreter, and that they have been informed that their choice could lead to ineffective communication. Staff has been instructed to use the Universal Template when entering comments on case actions.

Documentation of interpreter signed confidentiality statement: Consent for the release of information shall be obtained from applicants/recipients when individuals other than the CWD employees are used as interpreters and the case record shall be so documented.

Corrective Action: Staff is reminded to have the interpreter and the client sign the HSA 31 which is the certification of confidentiality and the consent for release of information form for our agency.

Documentation of Primary Language: Each agency shall ensure that the case record identification shows the applicants/recipients ethnic origin and primary language.

Corrective Action: Documentation of primary language and ethnic origin is captured on the C-IV Individual Demographics Detail page. Both fields are mandatory. Each case also contains an SJ 100, Documentation of Language Preference/Offer of Interpreter; even if the client's primary language is English. The SJ 100 is included in all applications; add programs, and renewal/recertification packets.

Documentation that bilingual services were provided: Document the method used to provide bilingual services, e.g., assigned worker is bilingual, other bilingual employee acted as interpreter, volunteer interpreter was used, or client provided interpreter.

Corrective Action: To the extent possible, non-English speaking clients are assigned to a worker who speaks the same language. Employees are required to document in journal notes each time an interpreter is used.

General: San Joaquin HSA must ensure that proper documentation is kept in the file that identifies all the required elements to ensure compliance.

Corrective Action: Ongoing education and training continues to be provided for workers.

VIII. DISCRIMINATION COMPLAINT PROCEDURES

Counties are required to maintain a process for addressing all complaints of discrimination. They must track complaints of discrimination through the use of a control log in which all relevant information is kept, including when the complaint was received, the name of the complainant, identifying numbers and programs, basis of discrimination, and resolution. It is usually the Civil Rights Coordinator responsibility to maintain this log.

Civil Rights Coordinator: San Joaquin County HSA will ensure that staff is knowledgeable regarding contact information of the Civil Rights Coordinator, at minimum, where the information can be located.
Div. 21-117 and 21-107.21

Corrective Action:

The Civil Rights Coordinator will continue to work with management staff to remind all staff of the contact information of the Civil Rights Coordinator and where the information can be located.